

REGISTRATION PERMIT IMPLEMENTATION MEETING

August 10, 2005

REVIEW OF PROPOSED REGISTRATION OPERATION PERMIT (ROP)

ROP permit – changes from earlier draft

- Alternative control efficiencies can be used if they are from a Department approved emission test
- Annual records instead of monthly records for emissions
- Modeling requirement clarified to indicate that only criteria pollutant modeling is required (*not in your draft*)
 - NR 445 compliance treated independently from ROP eligibility
- Consolidated some reporting requirements (compliance cert/ monitoring report/AEI)

ROP permit – changes from earlier draft

- Clarified that facility must pay annual emission fees
- LACT limit changed to an annual limit
- All process lines willing to take 10 tpy VOC limit may choose LACT instead of 85% control (removed 12,000 acfm pre-requisite)
- Safe harbor “reasonable search and evaluation” documentation not required by the permit (but you won’t qualify for safe harbor without it)

ROP Permit – Content and Format

- Corrections?
- Suggestions?
- Comments?

REVIEW OF PROPOSED ROP PROCESS

ROP Process – Step 1

- **Step 1 - Revocation of previously issued permits and orders**
 - Facility reviews ROP eligibility criteria
 - Facility requests revocation of previously issued permits/orders
 - DNR reviews permits/orders to ensure “revocability”
 - If revocable, DNR satisfies revocation notification requirements
 - 14 days for construction permits, 21 days for operation permits
 - Revocation doesn’t actually occur until ROP coverage is granted
 - After satisfying notification requirements, DNR notifies facility they may proceed with ROP application


ROP Process – Step 2

- **Step 2 – Pre-application package**
 - Prepares applicant to fill out online application
 - Introduction – Is a ROP right for you?
 - ROP worksheet (hardcopy of application)
 - ROP application question help
 - Example: “Do all of the air pollution control devices at your facility meet the minimum control efficiencies contained in the ROP?”
 - What does this question mean?
 - What is a control efficiency?
 - How is control efficiency calculated
 - How do I determine the control efficiency of my devices?
 - If I use multiple control devices for the same process, how do I determine the overall control efficiency?
 - What happens if I answer “yes”? What happens if I answer “no”?

ROP Process – Step 3

- **Step 3 – Web-based ROP application**
 - Brief overview of application process
 - Provides link to pre-application package
 - 11 yes or no questions
 - Facility-specific information
 - Facility identification number (FID)
 - Facility location
 - Responsible official
 - Permit contact
 - Submit online, but also print, sign and send copy of the application to DNR...for now

Welcome Page



State of Wisconsin
Air Permits Online

Wednesday, July 20, 2005

Registration Permit System - Welcome

Welcome to the Wisconsin Department of Natural Resources Online Registration Permit System. This system currently accepts requests for REGISTRATION PERMITS. For other types of Air Permits, please contact the Air Management Division using the resources shown on the left.

Helpful Resources

Department of Natural Resources - Air Management Division:

- Phone: 608-266-2621
- Fax: 608-261-4380
- TTY: 608-267-6897
- 101 S Webster St
PO Box 7921
Madison, WI 53707-7921
- Official Web Site

Related Web Sites:

- Licenses, Permits and Registrations
- Wisconsin State Legislature
- Wisconsin.gov
- Wisconsin Governor: Jim Doyle
- Environmental Protection Agency

Web Site Technical Support:

- 608-267-7544
- Joydeb Bhattacharyya

Introduction

In June 2003 DNR Secretary Scott Hassett unveiled the Air Permit Improvement Initiative (APII) to increase efficiency in the agency's air permitting program. This program is designed to maintain existing environmental standards while improving service and streamlining the issuance of air permits including a new type of permit known as a REGISTRATION PERMIT. This site was developed to help businesses understand and apply for these permits online. You can use this site to find out if your business qualifies for a REGISTRATION PERMIT and if so, to apply online.

Applying for a Registration Permit

The process of applying for a REGISTRATION PERMIT consists of the following steps:

1. Education - Learn about REGISTRATION PERMITS, the compliance requirements and if your facility qualifies for this type of permit
2. Emissions Info - Complete the Application Worksheet and enter the required emissions data
3. Facility Info - Provide information about your facility and the responsible personnel
4. Signature - Send your signed application to the Department of Air Management
5. Notification - We will notify you if your application was approved or provide reasons why your facility does not qualify

Note: The information required on a REGISTRATION PERMIT application is technical. This online process is intended to be used by qualified applicants such as facility engineers.

To learn more about REGISTRATION PERMITS, check if you qualify, and to begin the online application process, press the 'Continue' button below.

WARNING!
This site is an Official United States Government System, which may be used only for authorized purposes. Unauthorized modification of any information stored on this system may result in criminal prosecution. The Government may monitor and audit the usage of this system, and all persons are hereby notified that the use of this system constitutes consent to such monitoring and auditing. Unauthorized attempts to upload information and/or change information on these web sites are strictly prohibited and are subject to prosecution under the Computer Fraud and Abuse Act of 1986 and Title 18 U.S.C. Sec. 1001 and 1030.

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**Contact Information
Provided**

**What To Expect
is Explained**



State of Wisconsin

Wednesday, July 20, 2005

Air Permits Online

Compliance Worksheet Questions

Worksheet Entry

Enter the answers from your worksheet for the question number shown. After choosing 'Yes' or 'No', you may be prompted for additional information to support your answer.

To return to the previous question, click 'Back'. To accept your answer, click 'Continue'.

You have completed 0 of 8 worksheet questions.

AIR POLLUTION CONTROL REGISTRATION OPERATION PERMIT APPLICATION

Question # 1

Actual air pollutant emissions from my facility for the coming calendar year, excluding lead, will be less than 25% of the applicable major source threshold; and lead emissions from my facility for the coming calendar year will be less than 0.5 tons per year.

< Back

Yes

No

Continue >

You have answered ' YES ' to Question # 1

To change your answer, choose a new value. To accept your answer click 'Continue'



WARNING

Additional Information:

In calculating emissions actual emissions, you must use the pollution control device control efficiencies and hood capture values in Appendix 1 of the application.

**Simple Yes/No
Question Format**



State of Wisconsin

Wednesday, July 20, 2005

Air Permits Online

Compliance Worksheet Questions

AIR POLLUTION CONTROL REGISTRATION OPERATION PERMIT APPLICATION

Worksheet Entry

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< Back

Yes

No

Continue >

You have answered 'YES' to Question # 1

To change your answer, choose a new value. To accept your answer click 'Continue'



WARNING

Additional Information:

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**Content Specific
Help**



State of Wisconsin

Wednesday, July 20, 2005

Air Permits Online

Compliance Worksheet Questions

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AIR POLLUTION CONTROL REGISTRATION OPERATION PERMIT APPLICATION

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No

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In calculating emissions actual emissions, you must use the pollution control device control efficiencies and hood capture values in Appendix 1 of the application.

***“Ineligibility”
answers will
trigger warning
message specific
to question!***

*Minimal amount
of information
needed*

*Not asked for until
after applicant can
“predetermine”
eligibility*

*Applicant
remains
anonymous
until they chose
to continue*

The screenshot shows a web browser window displaying the 'Air Permits Online' portal for the State of Wisconsin, Department of Natural Resources. The page is titled 'Facility Information' and is part of the 'AIR POLLUTION CONTROL REGISTRATION OPERATION PERMIT APPLICATION'. The form is divided into several sections: 'Facility Info' (instructions), 'Facility Name and Mailing Address', 'Facility Location', 'Parent Corporation', 'Responsible Official', 'Permit Contact Person', and 'Facility Identification'. The 'Facility Name and Mailing Address' section includes fields for Name, Street or Route, City, State (WI), and Zip Code. The 'Facility Location' section includes fields for Street or Route, City, County (Dane), and Name. The 'Parent Corporation' section includes fields for City, State (WI), Zip Code, and Country (If not USA). The 'Responsible Official' section includes fields for Name (F,M,L), Title, Telephone, and E-mail. The 'Permit Contact Person' section includes fields for Name (F,M,L), Street or Route, City, State (WI), Zip Code, Country (If not USA), Title, Telephone, Fax, and E-mail. The 'Facility Identification' section includes fields for Facility SIC or NAICS code, Facility identification number (FID), and a section for nonattainment designation. The 'Next Steps' section at the bottom provides instructions on how to proceed, with a blue circle highlighting the 'Continue >' button. A blue arrow points from the text 'until they chose to continue' to this button. The footer of the page contains copyright information: ©2005 - Wisconsin Department of Natural Resources - Division of Air Management • 608-266-2621 • Fax: 608-261-4380.

State of Wisconsin
Air Permits Online
Wednesday, July 20, 2005

Facility Information

**AIR POLLUTION CONTROL
REGISTRATION OPERATION PERMIT APPLICATION**

Facility Info
You have completed the question and answer section of the application.
On this page, enter information about your facility.
To avoid delays in processing, please double check the provided answers for accuracy.
Next, you will review your entire application and then submit it for consideration.
Note: Fields in **bold** are required.

Facility Name and Mailing Address
Name:
Street or Route:
City, State, Zip Code: WI

Facility Location
Street or Route:
City, County: Dane
Name:
Street or Route:

Parent Corporation
City, State, Zip Code: WI
Country (If not USA):

Responsible Official
Name (F,M,L):
Title:
Telephone:
E-mail:

Permit Contact Person
Name (F,M,L):
Street or Route:
City, State, Zip Code: WI
Country (If not USA):
Title:
Telephone:
Fax:
E-mail:

Facility Identification
Facility SIC or NAICS code:
Facility identification number (FID):
If facility is located in an area designated as "nonattainment", indicate the pollutant(s) for the nonattainment designation:
Briefly describe the facility to be permitted:

Next Steps:
Click 'Back' to return to the Question and Answer section of the application.
Click 'Continue' to review your entire application.

< Back Continue >

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ROP Process – DNR Processing

- Electronic application automatically sent to DNR in-house processing software
 - “Submittal acknowledgement” e-mail automatically sent to applicant
- DNR receipt of application hardcopy manually entered into software
 - “Receipt of hardcopy application” e-mail automatically sent to applicant
- Within 15 days, DNR makes determination of coverage
 - “DNR determination of coverage” e-mail automatically sent to applicant
 - DNR sends hardcopy letter to facility granting coverage under ROP and revoking previously issued permits
 - DNR databases updated to reflect coverage under ROP and revocation of old permits

ROP post-application materials

- Living under your ROP
 - What the ROP conditions mean and how to comply with them
 - What is safe harbor?
 - What to do if you want out of the ROP
- Identifying and complying with other state and federal air pollution requirements
 - What requirements that are not in the permit may apply to your operations
 - Understanding and complying with these requirements
 - Don't throw out your old permits – use them for reference

**REVIEW OF PROPOSED
REGISTRATION CONSTRUCTION PERMIT
(RCP)**

RCP permit – changes from earlier draft

- Alternative control efficiencies can be used if they are from a Department approved emission test
- Removed compliance certification/monitoring report
- All process lines willing to take 10 tpy VOC limit may choose LACT instead of 85% control (removed 12,000 acfm pre-requisite)
- Facility must conduct modeling analysis as part of RCP application

RCP Permit – Content and Format

- Corrections?
- Suggestions?
- Comments?

REVIEW OF PROPOSED RCP PROCESS

RCP Process

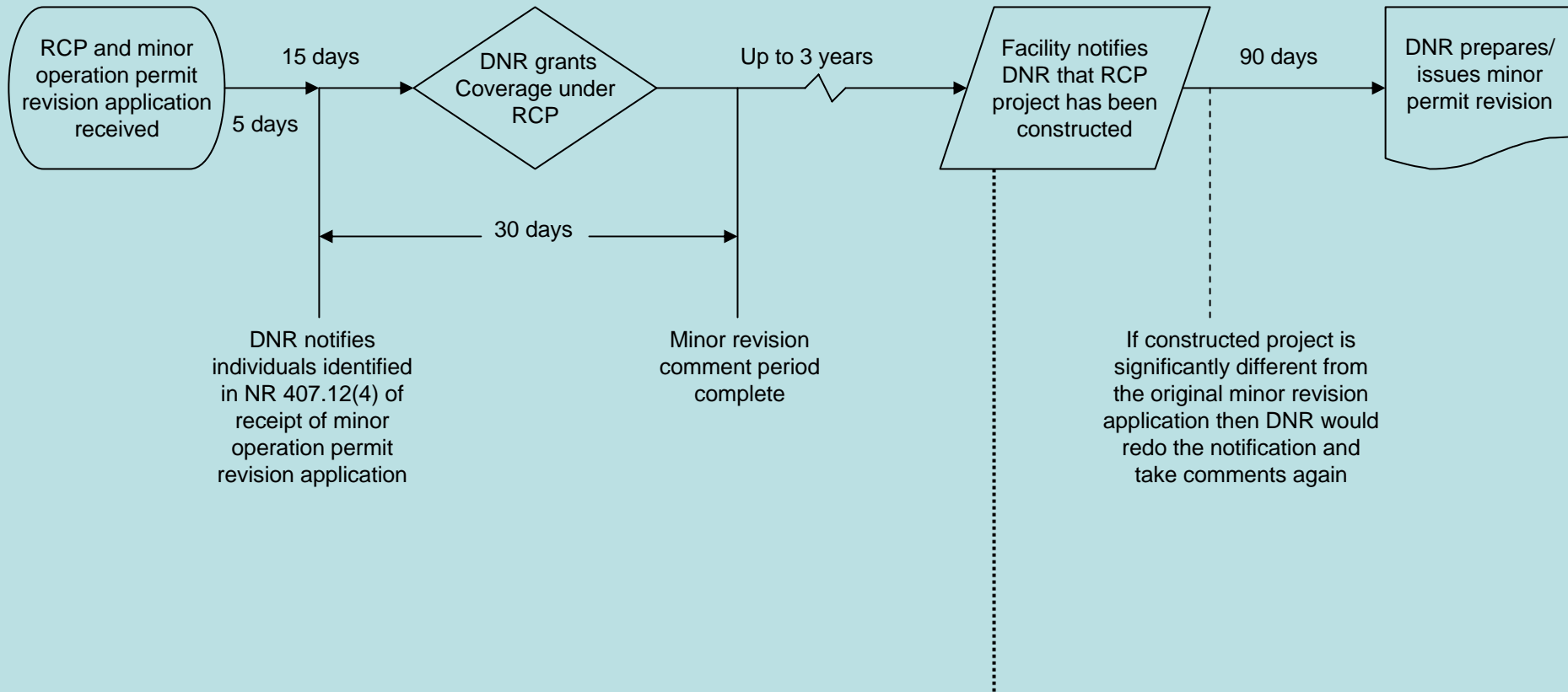
- Facility submits hardcopy of RCP application and minor operation permit revision application to DNR
 - Includes modeling analysis
 - First model project
 - If project impact is greater than Class II PSD significant impact levels (SIL) then model entire facility for NAAQS and increment

Class II PSD Significant Impact Levels		
Pollutant	Averaging Period	Significant Impact Level ($\mu\text{g}/\text{m}^3$)
PM ₁₀	Annual	1
PM ₁₀	24 hour	5
SO ₂	Annual	1
SO ₂	24 hour	5
SO ₂	3 hour	25
NO _x	Annual	1
CO	8 hour	500
CO	1 hour	2,000

RCP Process (Cont'd)

- DNR satisfies minor revision notification requirements (notify interested parties, take 30 days of comments)
- DNR grants/denies RCP coverage within 15 days of receipt of RCP application
- Facility may begin construction and initial operation
- After completion of construction (or earlier) DNR processes minor operation permit revision
 - RCP emission cap, associated recordkeeping, and generalized LACT are carried forward into the operation permit

Registration Construction Permit / Minor Operation Permit Revision Interface



Note: DNR may issue the minor revision before construction is complete.